**Reply to Hans-Peter Helfert WT 16-239**

This is in reply to the communication between Scot Stone and Hans-Peter Helfert of SCS. Why this was posted to the NPRM (WT 16-239) 5 months after the fact is a mystery, filed well after the allowed comment and the reply period.

Mr. Helfert is indeed correct in his statement that Pactor can be monitored with the proper equipment, but the "Listen" mode of the SCS modems only works for Forward Error Correction (FEC or Unproto) mode and not compressed Automatic Repeat Request (ARQ) mode. That's according to the official SCS users manual, https://www.p4dragon.com/download/SCS_Manual_PTC-IIIusb_4.1.pdf pages 65 and 91. The problem is the way Pactor is implemented on amateur bands today, compressed ARQ for which, to my knowledge, no decoder exists and Pactor isn't the only mode that has no 3rd party decoder available. So no, I and others aren't a bunch of "notoric "PACTOR haters" –I strongly object to that characterization—the only thing being objected to is the abuse of amateur radio spectrum using modes that can't be decoded to ensure rules compliance and non-commercial content.

The only current use for Pactor on the amateur bands is for email and file transfer to bypass other commercial services that exist for that function http://www.pactor.com/ and most of the users care little about the amateur service traditions or rules beyond email or weather reports. This is the implementation of Pactor, and a few other modes that can't be intercepted, that most object to.

The primary system using Pactor on the amateur bands is Winlink, parent organization is The Amateur Radio Safety Foundation Inc. The system seems to have ongoing issues with callsign pirating, questionable message content – it's virtually all 3rd party traffic – and other possible rules violations. The amateurs operating Radio Message Servers (RMS) in the system are not even able to read the messages flowing through their stations locally in real time – puts into question whether 3rd party intercepts are possible – and must log on to a central server to review messages. How many RMS operators actually review messages in a timely fashion?

The question has been asked many times before, can someone with an SCS modem decode a compressed ARQ email or file transmission, the way it's currently implemented on the amateur bands, resulting in 100% readable plain text? Perhaps what's needed is a live demonstration of a 3rd party intercept, and successful decode of a random off air ARQ transmission, with Pactor and the other modes commonly used by the Winlink system. A question for Mr. Helfert, do any of the software decoding packages he mentioned – professional level and priced accordingly – have the above capabilities?

Emergency communications is used as justification for WT 16-239, to enable faster data transfer, but the recent multiple requests for Pactor 4 STA's and resulting non-use, or very little use, of Pactor 4 suggests the goal for higher speeds is for purposes other than infrequent emergencies. Whether the operation of Pactor and other modes for email on the amateur radio HF bands is a valid and necessary use, and should continue to be allowed, is a question for the Commission.

Amateur radio should be a free and open service not some playground for hidden transmissions, national security comes to mind in this instance, that amateurs don't have the ability to self-police or refer to the Commission for further investigation. I have previously submitted a petition addressing the problems outlined here, and other issues, currently sitting in the ECFS inbox awaiting action. https://ecfsapi.fcc.gov/file/100918881206/PETITION%20FOR%20RULEMAKING.pdf

Thank you,

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